

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	
	:	
- v. -	:	
	:	
THE M/Y <i>AMADEA</i> , A MOTOR YACHT	:	
BEARING INTERNATIONAL MARITIME	:	23 Civ. 9304 (DEH)
ORGANIZATION NO. 1012531, INCLUDING	:	
ALL FIXTURES, FITTINGS, MANUALS,	:	
STOCKS, STORES, INVENTORIES, AND	:	
EACH LIFEBOAT, TENDER, AND OTHER	:	
APPURTENANCE THERETO,	:	FILED UNDER SEAL
	:	
Defendant- <i>In-Rem</i> .	:	
	:	
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DECLARATION OF [REDACTED]

[REDACTED] declares that the following is true and correct under penalty of perjury pursuant to 28 U.S.C. §1746:

1. This declaration is made upon my personal knowledge and submitted in support of my motion to quash the government's subpoena for my deposition testimony in the matter of *United States v. M/Y Amadea*, No. 23-cv-9304 (DEH).
2. I am a finance professional who previously held senior positions at [REDACTED] in New York, London and Moscow. While in Moscow, I was part of the [REDACTED] team providing investment advice to the family investment vehicles of Suleyman Kerimov ("SK"), a Russian businessman. In that role and my subsequent role as a direct investment advisor to family investment vehicles, as a financial professional giving investment advice – along with many other American professionals who also provided financial and legal advice to SK's family investment vehicles – I became aware of the relationship between Nariman Gadzhiev ("NG") and NG's uncle SK. My advisory role had already substantially diminished in 2017 and ended entirely in 2018 when I followed through on an existing plan to return to the U.S.
3. When I left Moscow with my spouse and children in 2018, my aged, blind father remained in Moscow pending arrangements to securely relocate to the U.S., as well. When I returned to Moscow to visit my father for the New Year's holiday in early 2019,

I refused to deal with SK due to the U.S. sanctions against him. In response, SK threatened me, including initiating a Russian Federal Security Service investigation designed to imprison me. I narrowly escaped Russia but was forced to leave my father behind and flee separately from my spouse and small children to have a chance to escape. My blind father remained in Moscow, effectively as SK's leverage over me. The trauma of that near death experience defines every aspect of my and my family's lives to this day.

4. During this period which lasted approximately three years from January 2019 to December 2021, American professionals who continued to advise SK's financial vehicles and remained in contact with NG and SK acknowledged SK's threat against me.
5. The threat grew so severe that on May 3, 2019, I emailed David Cohen about the sanctity of life, a reference to my intense fear for the safety of my father in Moscow and the safety of my family in the United States.
6. On May 17, 2019, James Langdon shared a draft of his message to NG, intended for SK, that referred to "a dispute with the Trust" – an oblique reference to SK's threats against me.
7. The urgency of the threat prompted Akin Gump to send partner Paul Butler, who represented SK, to Moscow for an immediate meeting with SK on May 21, 2019, to address SK's threats against me.
8. Upon his return from Moscow on May 22, 2019, Butler explicitly acknowledged that SK had admitted threats against me, including initiating the Russian criminal investigation, and that he will maintain the pressure against me to deter me from interfering with his interests and until I came to Moscow to speak with him.
9. My efforts to get help from Langdon, Butler, or Cohen provided no relief. My father's medical condition continued to deteriorate. In January 2020, when my father was placed on life support in Intensive Care, I underscored the severity of the threat from SK when I wrote to Langdon about "the dire medical condition that has recently hit my father in Moscow. What has been particularly difficult is that none of his sons can be with him." After this message, doctors treating my father in Moscow came under pressure – which could only have come from SK – to have him removed from the hospital.
10. In March 2020, Langdon acknowledged the threat, writing "I understand a bit about the tension between you and your former associates in Moscow such that you are concerned about returning to Russia. In this regard, I instructed the Trust's counsel from Miller & Chevalier to engage in very direct discussions with Nariman Gadzhiev."

11. Nearly three years of complete disengagement from SK allowed me to finally bring home my father in December 2021. SK's threat requiring me not to participate in any action against his interests, affirmed by Akin Gump in 2019, has remained, and is acutely perceived as an existential threat by me and my family.
12. In support of my motion to quash the government's subpoena, I am attaching eleven exhibits. I declare that:
 - a. Exhibit 2 is a true and correct copy of an April 24, 2019 letter from David Cohen to Nariman Gadzhiev.
 - b. Exhibit 3 is a true and correct copy of a May 3, 2019 email from me to David Cohen.
 - c. Exhibits 4 and 5 are true and correct copies of draft Akin Gump letters from May 2019.
 - d. Exhibit 6 is a true and correct copy of January 2020 emails between me and Jim Langdon.
 - e. Exhibit 7 is a true and correct copy of a March 20, 2020 email from Jim Langdon to me.
 - f. Exhibit 8 is a true and correct copy of a March 20, 2020 letter from Jim Langdon to me.
 - g. Exhibit 9 is a true and correct copy of a June 26, 2018 email from Selim Elgen to Jim Langdon.
 - h. Exhibit 10 is a true and correct copy of an August 6, 2018 email from Jason Wang to Nariman Gadzhiev.
 - i. Exhibit 11 is a true and correct copy of emails and correspondence from 2019 regarding Heritage Trust.
 - j. Exhibit 12 is a true and correct copy of a November 14, 2022 press statement from U.S. Secretary of State Antony Blinken ("Targeting Russia's Global Military Procurement Network and Kremlin-Linked Networks").

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 24, 2024

[Redacted Signature]